

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UGOCHUKWU GOODLUCK  
NWAUZOR, FERNANDO AGUIRRE-  
URBINA, individually and on behalf of all  
those similarly situated,

Plaintiffs,

v.

THE GEO GROUP, INC., a Florida  
corporation,

Defendant.

No. 17-cv-05769-RJB

DECLARATION OF JAMAL N.  
WHITEHEAD IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT

I, JAMAL N. WHITEHEAD, declare as follows:

1. I am over the age of eighteen, competent to testify in this matter, and do so  
based on personal knowledge.

2. I attach as Exhibit 1 true and correct copies of excerpts from the deposition of  
Byron Eagle, taken December 5, 2019. At the time of his deposition, Mr. Eagle was the Chief  
of secure residential operations for the Washington Department of Corrections.

3. I attach as Exhibit 2 true and correct copies of excerpts from the deposition of  
Debra Jean Eisen, taken December 13, 2019. At the time of her deposition, Ms. Eisen was the  
Contracts Administrator for the Washington State Department of Corrections.

4. I attach as Exhibit 3 true and correct copies of excerpts from the deposition of David Holt, taken December 17, 2019. At the time of his deposition, Mr. Holt was the CEO of Western State Hospital.

5. I attach as Exhibit 4 true and correct copies of excerpts from the deposition of Sean Murphy, taken December 19, 2019. At the time of his deposition, Mr. Murphy was the Assistant Secretary for the Behavioral Health Administration within the Washington Department of Social and Health Services.

6. I attach as Exhibit 5 true and correct copies of excerpts from the deposition of Plaintiff Ugochukwu Goodluck Nwauzor, taken June 19, 2018.

7. I attach as Exhibit 6 true and correct copies of excerpts from the deposition of Christina Wells, taken December 16, 2019. At the time of her deposition, Ms. Wells was a Residential Habilitation Center Program Manager for the State of Washington.

8. I attach as Exhibit 7 a true and correct copy of the 2011 PBNDS Standards,  
§ 4.1 - Food Service.

I declare under penalty of perjury under the laws of the United States that the above is true and correct.

DATED at Seattle, Washington this 27th day of March, 2020.

s/ Jamal N. Whitehead  
JAMAL N. WHITEHEAD